

JUAN MORGAN
CASA # 77
FORT CLAYTON
PANAMA CITY, PANAMA
PSC 2 BOX R-3924
APO AA 34002

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U.S. DISTRICT COURT

November 16, 2007

Hon. Judge Royce C. Lamberth
United States District Court
1225 E. Barrett Prettyman
United States Courthouse
333 Constitution Avenue, N.W.
Washington, DC 20001

RE: Juan Morgan v. Secretary of Agriculture
Civ. No. 05-989(RCL) ECF

Honorable Sir:

I am the plaintiff pro se in this matter. I am seeking an extension of the discovery deadline from November 30, 2007 through February 29, 2008.

This action asserts that I was forced out of the Foreign Service of the Department of Agriculture due to a racial and national origin discrimination, which caused stress related mental and physical injuries and eventually forcing me to resign as the alternative to termination. The events in issue transpired between 2000 and 2003. An extensive record was developed in-house. After the EEOC dismissed the matter on mutual consent, this action was filed in 2005.

As of today, the government and I have engaged in extensive discovery including my provision of documents and answers to interrogatories as well as their taking my deposition and my taking the deposition of my second line supervisor, Dr. Angelo Cielo. These are the witnesses other than one Frank C. Vollmerhausen, who we will be deposing in the next few weeks. These are the witnesses who can be deposed with a notice only as they still work for the Department.

However, it became apparent from Dr. Cielo's testimony that I will need to depose my prior first line supervisor, Mr. James Swenson and Dr. Harold Hoffman and perhaps my prior second line supervisor, Dr. John H.

Wyss, as Dr. Cielo asserts that he had no role in, or knowledge of the actions taken by those individuals. Further, due to Dr. Cielo's testimony as to the extent of my responsibilities in the Panama City office, I may need to take the depositions of my two immediate subordinates as to that issue. Both are Panamanian nationals and I do not know their employment status. Thus, some more work must be done before this case can be ready for trial. I do not know the current location of any of these individuals as Messrs. Swenson, Hoffman and Wyss are retired.

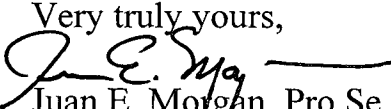
I understand that Dr. Wyss is in Austria. I am informed that if Dr. Wyss or any of the Panamanian witnesses are unwilling to cooperate, I will need to apply for a request to the Courts of their nations to obtain authority to take these depositions and I understand that process can be time consuming.

While I am receiving assistance in this work from John F. McHugh, the New York City attorney who represented me before the agency, I have been unable, to date, to find an attorney in the District who will serve as local counsel and either take responsibility for this case or move the admission of Mr. McHugh. My efforts in that regard are ongoing. In the meantime I am attempting to do as much as possible myself and with Mr. McHugh's help to the extent possible under the circumstances.

I have continuing health issues and limited funds, both of which have slowed this process significantly.

Based upon all of this, I respectfully request that the time to complete discovery in this matter be extended through February 29, 2008.

Thank you for your attention to this request.

Very truly yours,

Juan E. Morgan, Pro Se.

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